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OFFICE OF GENERAL  
COUNSEL

Zachary G. Parks

Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 5208  
zparks@cov.com

May 5, 2017

Ms. Lisa J. Stevenson  
Acting General Counsel  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

**Re: Response to March 20, 2017 Letter and Request for Pre-Probable Cause Conciliation — MUR 7221 (Steve Polce)**

Dear Ms. Stevenson:

We write on behalf of our client Steve Polce in response to the Commission's letter dated March 20, 2017. Mr. Polce respectfully requests that the Commission engage in pre-probable cause conciliation to resolve this matter.

Steve Polce is a former Vice President at Mepco LLC. On January 29, 2014, Mr. Polce made a *sua sponte* filing with the FEC. In that filing, he explained that, prior to November 2013, he reported directly to Mepco's then-CEO James Laurita, Jr. Beginning in 2010, the *sua sponte* filing explained, "Mr. Laurita, either directly or through intermediaries," asked Mr. Polce and others "to make political contributions in suggested amounts to specific candidates and assured them that they would receive direct payroll deposits that would cover the amount of the suggested contribution(s)." The *sua sponte* filing further explained that, "pursuant to these instructions," Mr. Polce and others "made political contributions and accepted payroll deposits which were intended to reimburse them for, or pay them in advance for" these contributions.

Given the extensive factual record, Mr. Polce's *sua sponte* filing, and the likelihood that the Commission and Mr. Polce can agree on the violation and facts, pre-probable cause conciliation is appropriate here. Pursuant to the Office of General Counsel's Enforcement Manual, pre-probable cause conciliation is appropriate where further investigation is not necessary, the facts are sufficient to establish a violation of the Act, and it is likely the respondent and Commission can agree on the violation and facts. See FEC, *Guidebook for Complainants and Respondents on the FEC Enforcement Process* 14, 16-17 (May 2012); FEC, *OGC Enforcement Manual* 77 (June 2013). Moreover, the Commission's *Sua Sponte Policy*

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Mr. Polce would be pleased to consider any requests from the Commission for additional information that might assist it in resolving this matter through pre-probable cause conciliation.

Respectfully Submitted,



Zachary G. Parks

Andrew D. Garrahan

COVINGTON & BURLING LLP

*Counsel to Steve Polce*

cc: Ms. Jin Lee  
Mr. Nicholas Mueller

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